



Academy of Certified Hazardous Materials Managers

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Date: November 5, 2004

To: Environmental Protection Agency

Re: EPA docket [SFUND-2004-0001; FRL-7806-2]

I the undersigned support the word changes to this rule that the Academy of Certified Hazardous Materials Managers has proposed as is listed below.

As currently proposed in §312.10 EP Definition: section (2)(iii) the language is, as follows:
(iii) have a Baccalaureate or higher degree from an accredited institution of higher education in a relevant discipline of engineering, environmental science, or earth science and the equivalent of five (5) years of full-time relevant experience;

We strongly suggest that within the definition of Environmental Professional the wording in section §312.10 (2)(iii) be amended to the following:

§312.10 EP Definition, section (2)(iii) have any Baccalaureate or a higher degree from an accredited institution of higher education in relevant disciplines of engineering, environmental, earth, physical, or natural sciences and the equivalent of five (5) years of full-time relevant experience;

As stated in the FR notice there is a “grandfathering” clause but that only applies to the inquiry rule activities specifically. We propose that the wording should be as follows:

§312.10 EP Definition, section (2)(iv) As of the date of promulgation on this rule, have a Baccalaureate or higher degree from an accredited institution of higher education, or be individuals that are certified by a professional organization that is third party accredited and have ten (10) years of full-time of relevant experience.

Should you have any questions or request any information please feel free to contact either the Academy or myself at tlacki@ensafe.com or 901.372.7962.

Sincerely,

*Thomas Lacki, CHMM
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EnSafe Inc.*

CC: c/o: academy@achmm.org